

ATTACHMENT 6

INSPECTION PLAN

6-1 INSPECTION SCHEDULE [264.15 and 270.14(b)(5); R315-8-2.6 and 3-5(b)(5)]

The inspection schedule provided in Table 6-1 addresses the security controls, communications equipment, safety and emergency equipment, backup generator system, monitoring equipment, and operating and structural equipment to be used during Rapid Response System operations. The purpose of these inspections will be to prevent malfunctions and detect deterioration, human errors, and discharges that may cause or lead to the release of waste to the environment or pose a threat to human health.

The inspections will occur as specified in Table 6-1. Many inspections will be area-wide and several will be more site-specific. All deficiencies will be documented, and corrective action will be initiated and tracked to completion in the Operating Record, which will be kept onsite at the test site. All inspection log sheets also will be kept onsite with the Operating Record.

6-1a General Inspection Requirements [264.15(a) and (b), 264.33, and 270.14(b)(5); R315-8-2.6(a) and (b), 8-3.4, and 3-5(b)(5)]

The inspection schedule is included in Table 6-1 and includes inspections general to the area as well as inspections specific to the unit to be permitted.

6-1a(1) Types of Problems [40 CFR 264.15(b)(3); R315-8-2.6(b)(3)]

The types of problems to look for during the inspection are listed in Table 6-1.

6-1a(2) Frequency of Inspection [40 CFR 264.15(b)(4); R315-8-2.6(b)(4)]

The frequency of inspection for all necessary items is listed in Table 6-1.

6-1b Specific Process Inspection Requirements

6-1b(1) Container Inspection [40 CFR 264.174; R315-8-9.5]

No permitted container storage is addressed in this permit; therefore, the requirements of this section are not applicable.

Table 6-1. Inspection Schedule

Inspection Item	Frequency ^a	Type of Problem	Location
264.15	264.15(b)(4)	264.15(b)(3)	
R315-8-2.6	R315-8-2.6(b)(4)	R315-8-2.6(b)(3)	
<u>MONITORING SYSTEMS</u>			
MINICAMS [®]	D	System damaged or malfunctioning, loss of physical integrity, flow rates out of range, calibration not current, support gases empty or expired, gas standards empty or expired, challenge not passed	Operations Trailer
DAAMS	D	System damaged or malfunction, loss of physical integrity, tubes not properly orientated or seated, program set incorrectly	Operations Trailer, MASP
Colorimetric tubes	D (when used)	Pump leaking or malfunctioning, tube QC inspection current (within 1 month) for lot in use (<i>checked monthly</i>)	Operations Trailer
Raman	D (when used)	System damaged or malfunctioning, chloroform spectra check unacceptable	Operations Trailer

Inspection Item 264.15 R315-8-2.6	Frequency ^a 264.15(b)(4) R315-8-2.6(b)(4)	Type of Problem 264.15(b)(3) R315-8-2.6(b)(3)	Location
<u>SAFETY AND EMERGENCY EQUIPMENT</u>			
Fire Extinguishers (12)	M	Access blocked, not charged, damaged	Building 4553 and RRS Operational Area
Safety Showers (7)	W	Not operational, access blocked	Building 4553
Eyewash ^c	W	Not operational, access blocked, low fluid	Building 4553, Chemical Storage Area and Operations Trailer
Emergency Personnel Decon Station	W	Not established, insufficient inventory, expired decon, liquids in pools	EPDS
First Aid Kit (2)	W	Not adequately stocked, missing	EPDS and Administration Office
Personnel Protective Clothing	W	Insufficient inventory, damaged, improperly stored	EPDS
Spill Kits (2)	W	Inadequate inventory, access blocked	RRS Operational Area

Inspection Item	Frequency ^a	Type of Problem	
264.15	264.15(b)(4)	264.15(b)(3)	
R315-8-2.6	R315-8-2.6(b)(4)	R315-8-2.6(b)(3)	Location

COMMUNICATIONS EQUIPMENT

Alarms ^b	W	Lights/sirens not operational, alarm test unsatisfactory, not accessible	Operations Trailer
Intercom System	D	Not functioning properly	Operations Trailer
Two-way Radios	D	Not functioning properly	Operations Trailer
Mobile Telephone	D	Not functioning properly	Operations Office

SECURITY DEVICES

Warning signs	W	Damaged, missing	Building 4553 and Operations Trailer
Barriers	W	Damaged, not in place, not functional	Building 4553
Doors	W	Poor physical integrity, evidence of tampering, lock malfunctioning	Building 4553 and Operations Trailer

Inspection Item	Frequency ^a	Type of Problem	Location
264.15	264.15(b)(4)	264.15(b)(3)	
R315-8-2.6	R315-8-2.6(b)(4)	R315-8-2.6(b)(3)	
<u>OPERATIONAL</u>			
Back Up Generator	D	Not set in AUTO mode	Utility Trailer
Loading Platform	D	Damaged, loose hardware, liquids under platform/on shelf, removable track section missing, structurally unsound	Operations Trailer
Glovebox	D	Damage to Lexan or housing, severe corrosion, liquids on glovebox floor, rear damper malfunctioning, lights malfunctioning or missing, drums not properly seated	Operations Trailer
Gloves	D	Improperly installed, damaged, gloveport loose or damaged	Operations Trailer
Engineering Control System	D	Insufficient negative pressure, differential pressure out of range, housing damaged, malfunctioning fan	Operations Trailer

Inspection Item	Frequency ^a	Type of Problem	Location
264.15	264.15(b)(4)	264.15(b)(3)	
R315-8-2.6	R315-8-2.6(b)(4)	R315-8-2.6(b)(3)	
<u>OPERATIONAL (Continued)</u>			
Back Up Fan	W	Damaged, malfunctioning, not connected, missing	Operations Trailer
Reactor	D (when performing Neutralization operations)	Severe corrosion, O-ring damaged or missing, crusher mechanism malfunction, temperature indicator missing or malfunctioning	Operations Trailer

Notes:

^a D = operational day
W = weekly
M = monthly

^b In addition to the RRS manual evacuation alarm, Building 4553 is equipped with a fire alarm that will be inspected semiannually as part of the DCD hazardous waste storage permit.

^c In addition to the two small, gravity fed eyewash stations, Building 4553 is equipped with seven fixed safety showers/eyewash stations, which will be inspected weekly.

6-1b(2) Tank System Inspection [40 CFR 264.195; R315-8-10]

No tank systems are addressed in this permit application; therefore, the requirements of this section are not applicable.

6-1b(3) Surface Impoundment Inspection [40 CFR 264.226(b) and (c); R315-8-11.3(b) and (c)]

No surface impoundments are addressed in this permit application; therefore, the requirements of this section are not applicable.

6-1b(4) Waste Pile Inspection [40 CFR 264.254(b); R315-8-12.3]

No waste piles are addressed in this permit application; therefore, the requirements of this section are not applicable.

6-1b(5) Land Treatment Facility Inspection [40 CFR 264.273(g); R315-8-13.4(g)]

No land treatment units are addressed in this permit application; therefore, the requirements of this section are not applicable.

6-1b(6) Landfill Inspection [40 CFR 264.303(b); R315-8-14.3(b)]

No landfills are addressed in this permit application; therefore, the requirements of this section are not applicable.

6-1b(7) Incinerator and Associated Equipment Inspection [40 CFR 264.347(b); R315-8-15.7(b)]

No incinerators are addressed in this permit application; therefore, the requirements of this section are not applicable.

6-1b(8) Miscellaneous Unit Inspections [40 CFR 264.602; R315-8-16]

The equipment associated with the glovebox that will be inspected is listed in Table 6-1. This table also lists the frequency of inspection, the types of problems to be looked for, and the location of the equipment to be inspected. All inspections will be logged on inspection log sheets shown in Attachment 6 Appendix 1.

All chemical materiel monitoring equipment will be inspected daily for proper operation.

Miscellaneous spare parts [TeflonTM tubing, Depot Area Air Monitoring System (DAAMS) tubes, MINICAMS[®] computer printer paper, MINICAMS[®] preconcentrator tubes, etc.] will be inspected when the equipment operator replaces the part.

The items that make up the safety and emergency equipment in Table 6-1 are discussed in detail in Attachment 3, Preparedness and Prevention Measures, and the inventory of emergency equipment is included in Table 3-1. The items that make up the personal protective equipment in Table 6-1 are discussed in detail in Attachment 3 Preparedness and Prevention Measures. The emergency personnel decontamination station (EPDS) and all personal protective equipment will be located adjacent to the Rapid Response System operating area within Building 4553.

6-1b(9) Containment Building Inspection [40 CFR 264.1101(c)(4); R315-8-20]

No containment buildings are addressed in this permit; therefore, the requirements of this section are not applicable.